

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9
---	---

**STIPULATION FOR ENTRY OF ORDER GRANTING FIFTH
ADJOURNMENT OF HEARING DATE AND EXTENSION OF THE
DEADLINE TO FILE REPLY TO RESPONSE TO MOTION OF THE
DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 (“DFFA”)
FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015
GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF
DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812
RELATED TO THE GRIEVANCE FILED ON BEHALF OF FIRE
FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA’S
REINSTATEMENT AND FOR RELATED RELIEF**

The City of Detroit, Michigan (“City”) and the Detroit Fire Fighters Association (“DFFA”), by their undersigned counsel, hereby stipulate and agree as follows:

1. On March 15, 2017, the DFFA filed the Motion for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit Resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola’s Reinstatement and for Related Relief (“Motion”) [Doc. No. 11811].
2. The City filed its response on April 5, 2017 [Docket No. 11837].

3. The matter is currently set for hearing on Wednesday, September 20, 2017, and the Court has set the deadline for the DFFA to file its reply brief as September 13, 2017 [Docket No. 12643].

4. The parties have conferred and have agreed to adjourn the hearing until Wednesday, October 18, 2017 at 1:30 p.m. and further ask that the Court extend the deadline for the DFFA to file its reply to the City's response to the Motion through and including October 11, 2017.

WHEREFORE, the Parties respectfully request that the Court enter an order adjourning the hearing on the Motion to October 18, 2017 at 1:30 p.m. and extending the deadline for the DFFA to file its reply to the City's response to the Motion through and including October 11, 2017, in substantially the same form as the proposed order attached as Exhibit 1.

STIPULATED AND AGREED TO ON September 6, 2017:

LAW OFFICE OF BARBARA A. PATEK, P.L.C.

By: /s/ Barbara A. Patek

Barbara A. Patek, Esq.

Law Office of Barbara A. Patek, P.L.C.

27 E. Flint Street, Suite 2

Lake Orion, Michigan 48362

Telephone: (248) 814-9470

pateklaw@gmail.com

Counsel for Detroit Fire Fighters Association

MILLER CANFIELD PADDOCK & STONE, PLC

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)

150 West Jefferson, Suite 2500

Detroit, Michigan 48226

Telephone: (313) 496-7591

Facsimile: (313) 496-8451

swansonm@millercanfield.com

Counsel for the City of Detroit, Michigan

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: City of Detroit, Michigan, Debtor.	Bankruptcy Case No. 13-53846 Judge Thomas J. Tucker Chapter 9
---	---

**ORDER GRANTING FIFTH ADJOURNMENT OF HEARING DATE AND
EXTENSION OF THE DEADLINE TO FILE REPLY TO RESPONSE TO
MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF
LOCAL 344 (“DFFA”) FOR ENTRY OF AN ORDER ENFORCING THE
NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA
AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA
CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF
OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA’S
REINSTATEMENT AND FOR RELATED RELIEF**

Upon the Stipulation for Order Granting Fifth Adjournment of Hearing Date and Extension of the Deadline to File Reply to Response to Motion of the Detroit Fire Fighters Association, IAFF Local 344 (“DFFA”) for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola’s Reinstatement and for Related Relief [Doc. No. 11811] (“Motion”); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT the hearing on the Motion now set for September 20, 2017 at 1:30 p.m. is adjourned to October 18, 2017 at 1:30 p.m.;

IT IS FURTHER ORDERED THAT the deadline for the DFFA to file its reply to the City's response to the Motion is hereby extended through and including October 11, 2017.